

BAKER BOTTS LLP

2001 ROSS AVENUE SUITE 900 DALLAS, TEXAS 75201-2980	AUSTIN BEIJING BRUSSELS DALLAS DUBAI HONG KONG HOUSTON	LONDON MOSCOW NEW YORK PALO ALTO RIYADH SAN FRANCISCO WASHINGTON
TEL +1 214.953.6500 FAX +1 214.953.6503 BakerBotts.com		

May 10, 2021

Hon. Peggy Kuo
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Jonathan Rubenstein
TEL: 2149536594
FAX: 2146614594
jonathan.rubenstein@bakerbotts.com

Re: *NOVAGOLD Resources Inc. v. J Capital Research USA LLC*, No. 20-cv-02875-LDH-PK; Briefing Schedule for Motion to Compel

Dear Magistrate Judge Kuo:

Pursuant to Your Honor's April 26, 2021 directive, the parties have met and conferred on Defendant's assertion of the reporter's privilege but have been unable to come to an agreement on the application of the privilege. The parties have agreed to the below briefing schedule for a motion to compel:

- May 19, 2021 – NOVAGOLD to file its Motion to Compel;
- June 2, 2021 – JCAP to file its Response;
- June 9, 2021 – NOVAGOLD to file its Reply.

Respectfully,

/s/ Jonathan Rubenstein
Jonathan Rubenstein
Counsel for Plaintiff NOVAGOLD Resources, Inc.